

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NO. LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiff in the case listed on the attached Exhibit and defendant American Medical Systems, Inc. ("AMS") advise the Court that they have compromised and settled all claims between them in this action, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiff and AMS jointly move the court to dismiss AMS as a defendant in this action with prejudice, and terminate AMS from the docket in the action. Other defendants remain in this action, and plaintiff will continue to prosecute her action against them.

Respectfully:

/s/ Barbara R. Binis
Barbara R. Binis
Stephen J. McConnell
Tracy G. Weiss
REED SMITH LLP
1717 Arch Street, Suite 3100
Philadelphia, PA 19103
215.851.8100 (phone)
215.851.1420 (fax)
bbinis@reedsmith.com

/s/ Edward F. Blizzard
Edward F. Blizzard
BLIZZARD MCCARTHY & NABERS
440 Louisiana Street, Suite 1710
Houston, TX 77002
713.844.3750 (phone)
713.844.3755 (fax)
eblizzard@blizzardlaw.com
Attorney for Plaintiffs on Exhibit A

s/s Erik W. Legg
Michael J. Farrell
Erik W. Legg
914 Fifth Avenue
Huntington, West Virginia 25701
304.522.9100 (phone)
304.522.9162 (fax)
ewl@farrell3.com

*Attorneys for Defendant American
Medical Systems Inc.*

Dated: January 9, 2015